MCI's Additional Performance Measurement Requirements

Including Measurements & Standards, Reporting Requirements, and Standard Order Activities

Ordering and Provisioning Function:	
Average Offered Interval	
Measurement Objective:	
Measures the average time from ILEC's receipt of an accepted service request to due date provided on order confirmation. Excludes orders where customer requested Due Date is beyond offered interval.	
Standard Order Activities (Updated List Including Number Porting and Suspend, Block Restore):	**Reporting Dimensions:**
• New Service Installations • Service Migrations Without Changes • Service Migrations With Changes • Local Number Porting • Move and Changes Activities • Feature Changes • Service Disconnects • Line Suspend, Block and Restore	• Standard Service Groupings • Standard Order Activities • Geographic Scope
Performance Standards in Absence Of ILEC Results (Not Included in the LCUG SQMs Document):	
Performance standard to be negotiated	
Measurement Formulas (Not Included In the LCUG SQMs Document):	
Average Offered Interval	

Maintenance and Repair Function:	
Number And Percent Of Maintenance Failures	
Measurement Objective:	
Measures the total number of failures as the total number of trouble reports where the trouble was closed out with a code indicating that the fault was an ILEC service problem.	
Disposition and Cause (Existing LCUG List):	**Reporting Dimensions:**
• Out of Service No Dispatch • Out of Service With Dispatch • Hold Open for Monitoring • Customer Premise Equipment Trouble (including inside Wire) • No Trouble Found • Central Office Equipment • Interoffice Facilities • Loop/Access Line • All Other Troubles • No Access	• Standard Service Groupings • Disposition and Cause • Geographic Scope
Performance Standards:	
Performance standard to be negotiated	
Calculations:	
• $\frac{\text{\# Of Maintenance Failures}}{\text{\# Of Trouble Reports}} \times 100$	

MCI's Additional Performance Measurement Requirements

Including Measurements & Standards, Reporting Requirements, and Standard Order Activities

Note: # of Maintenance Failures = Central Office Equipment + Interoffice Facilities + Loop/Access Line

EXHIBIT 2

MCI Telecommunications
Corporation
780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

December 17, 1997

Sharon Daniels
Sales Director
BellSouth Interconnection Services
Suite 420
1960 W. Exchange Place
Tucker, GA 30084

Dear Sharon:

This letter is to inform BellSouth of the ordering phases that MCI will use to complete our MCI's request for Switched Combinations of UNE Elements.

The phases, not necessarily in this order, will be to (1) Order end office trunk ports and tandem trunk ports for a tandem completing trunk group dedicated to MCI; (2) Establish unique AIN functionality through queries made by BellSouth to MCI's SCP and add feature functionality via BellSouth's SCE/SMS process.

As time is of the essence, I would like BellSouth to begin discussions on the following related items: (1) Trunk type translation requirements for each switch type; (2) Ordering forms or requirements (i.e. will MCI submit an order or will the Account Team handle these types of request); (3) How will MCI inform BellSouth of other carrier use of dedicated common transport; (4) How will MCI order overflow to existing BellSouth Common Trunk Group; (5) As MCI or third party will in all likely hood be the transport provider will an LOA be required for trunk port hand off (6) Will records recorded by BellSouth be processed separate or integrated feed; with respect to the AIN requirements; (6a) what will BellSouth require for SCP interconnection (i.e. testing, ordering, etc).

Based on MCI's interpretation of the Interconnection Agreement, these items are covered in Attachment III of the Interconnection Agreement (AIN sec 13.6 and Network Interconnection sec 15.6). It is MCI's expectations that the above question should be answered by no later than December 30, 1997. If you have any questions please feel free to contact me.

Sincerely,

Andri P. Weathersby
Sr. Manager

EXHIBIT 3

MCI Telecommunications
Corporation
Two Northwinds Center
2520 Northwinds Parkway
Alpharetta, GA 30004

March 27, 1998

Steve Harris
Sales Director
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

Dear Steve,

In reference to my letter (see attached copy) dated December 17, 1998 to Sharon Daniels referencing MCI's request for Switched Combinations of UNE Elements. As in my conversations with Sharon Daniels and you, I understand this request is now under your directions within BellSouth.

I received two emails from you on February 19 and February 25, indicating that MCI's request would be referred to the RTRG and that an internal BellSouth conference call was to be scheduled to discuss the requirements of MCI's request. Based on the last two voicemails I received from you on March 18 and March 20, you had indicated that BellSouth's real Time Resolution group was researching on how this process would be implemented and BellSouth would be responding by the end of the week.

To date, MCI has not received any satisfactory response on BellSouth's intent on responding to the original letter of December 17, 1997. MCI is requesting BellSouth to formally respond to the original request of December 17, 1997 by COB 4/3/98.

If you have any questions, please feel free to contact me.

Sincerely,

Andri Weathersby

cc: Sharon Daniels

EXHIBIT 4

BELLSOUTH

BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7500
Fax 770 621-0632

MCI Account Team

April 7, 1998

Andri P. Weatherby
Senior Manager
MCI Telecommunications
Two Northwinds Center
5th Floor
2520 Northwinds Parkway
Alpharetta, GA 30004

Dear Mr. Weatherby:

In response to your December 17, 1997, and March 27, 1998, letters, BellSouth has reviewed your request to provide what you described in subsequent conversations as a competitive Common Transport Trunk Group (CTTG). Based on our preliminary understanding of what is being requested and our interpretation of the Interconnection Agreement, it appears that MCIm can order Unbundled Network Elements (UNEs) to build a CTTG for use with end user customer traffic or Switched Access Traffic (i.e., Feature Group B/D).

However, after reviews with Subject Matter Experts (SMEs) within BellSouth, it became apparent that more specificity is needed. As such, please provide detailed diagrams with call flow indications, along with elemental components that you believe are required to deliver the end product. Once provided, we urge the formation of a project team to better understand and develop applicable requirements.

Please call me if you have any questions. I can be reached at (770) 492-7531.

Sincerely,

Steve Harris

Steve Harris
Sales Director
BellSouth Interconnection Services

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Application of BellSouth Corporation,	)	CC Docket No. 98-121
BellSouth Telecommunications, Inc.	)	
and BellSouth Long Distance, Inc.	)	
for Provision of In-Region, InterLATA	)	
Services in Louisiana	)	

Exhibit B:
Declaration of Bryan Green
on Behalf of MCI Telecommunications Corporation

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:	)	
	)	
Application by BellSouth Corporation,	)	
BellSouth, Telecommunications, Inc.	)	CC Docket No. 98-
and BellSouth Long Distance, Inc.,	)	
for Provision of In-region, InterLATA	)	
Services in Louisiana	)	

DECLARATION OF BRYAN GREEN
On Behalf of MCI Telecommunications Corporation

I, Bryan Green, being first duly sworn upon oath do hereby depose and state as follows:

1. My name is Bryan Green. I am the Senior Manager for MCI's Southern Financial Operations Group. As such, I have personal familiarity with the issues discussed herein or have gained familiarity through discussions with others at MCI. My responsibilities as Senior Manager involve implementing Operation Support Systems (OSS) that support MCImetro's entry into local telephone markets.

2. Before coming to MCI last year, I worked for Pacific Bell for more than eleven years. I held a number of positions with Pacific Bell including data communications manager, data network manager, data network designer, and product manager with responsibility for market and new product development. The majority of my tenure with Pacific Bell was in sales and marketing as a system design consultant. In this role, I was responsible for the design and

sale of data networks to medium and large business customers. I obtained a Bachelor of Science in Business Information and Computing Systems in 1984 from San Francisco State University.

3. The purpose of my affidavit is to respond to BellSouth's contentions (a) that it provides unbundled access to Operations Support Systems (OSS) functions in conformance with FCC regulations and (b) that its OSS systems and interfaces are fully ready and complete to satisfy its other obligations under section 271 of the Telecommunications Act. I conclude that BellSouth is not ready from an OSS perspective to provide interconnection, unbundled network elements, or resale in a timely, reliable, and nondiscriminatory manner, and in quantities that may be reasonably requested.

4. My affidavit is in two parts. Part I presents a general background on OSS functions, their development, and the role they play in the provision of local exchange service as well as the development of local competition. MCI has already submitted much of this information to the Commission in prior proceedings, but I include it here for the sake of completeness. Part II explains why BellSouth's OSS functions are not ready to provide CLECs interconnection and access to unbundled network elements or resale, in a timely, reliable, and nondiscriminatory manner.

5. In order better to enable the Commission to understand the particular ways in which BellSouth's OSS functions and interfaces are not operationally ready, I will specifically respond, where appropriate, to contentions raised in the Affidavits of William Stacy submitted with BellSouth's petition. Mr. Stacy's first affidavit ("Stacy OSS Aff.") can be found at Appendix A, Tab 22; his second affidavit ("Stacy Perf. Measures Aff.") can be found at Appendix A, Tab 23 of BellSouth's materials.

I. THE ROLE AND IMPORTANCE OF OSS

6. This Commission well understands what one industry publication explained, "OSS includes everything that runs or monitors the network, such as trouble reporting or billing systems, but is not actually the network itself."[1] Stated otherwise, OSS consists of all the computerized and automated systems, together with associated business processes, that ensure the carrier can satisfy customer needs and expectations. As this Commission stated, in today's environment, "operations support systems and the information they contain are critical to the ability of competing carriers to use network elements and resale services to compete with incumbent LECs." (Ameritech MI Order, ¶ 129, FCC 97-298). It is customary and useful to distinguish five discrete business functions OSS serves: pre-ordering, ordering, provisioning, maintenance & repair, and billing, as is explained in the FCC's Local Competition Order.[2]

7. Like all Bell Operating Companies (BOCs), BellSouth has for years utilized highly complex OSS systems to successfully manage its internal processes and customer interactions. These well-tested systems ensure, for example, that customer service representatives have immediate real-time access to all information necessary to respond fully and correctly to customer queries about such things as the variety and prices of services available, or the status of repair calls. They also ensure, among other things, that customer orders are correctly processed and that bills are accurate and timely.

1/ Ed Feingold, Making Sense of OSS, Billing World, Jan. 1997, at 21, 22.

2/ See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, First Report and Order, at ¶¶ 515, 518, CC Docket No. 96-98, FCC 96-325 (rel. Aug. 8, 1996) (hereinafter "Local Competition Order").

8. BellSouth's existing systems are complete and adequate to serve its own retail customers. Consistent with the Telecommunications Act of 1996, however, changes must be made to enable competition to develop in the local markets. To the extent new BOC competitors such as MCI must rely on the BOC's network and OSS capabilities for a realistic opportunity to compete, it is essential for the BOC to develop and implement OSS interfaces and downstream processes sufficient to ensure that they can provide unbundled network elements and resale rapidly and effectively in volumes adequate to satisfy demand. Another related point is that the FCC's rules specifically require that ILECs develop interfaces capable of providing CLECs nondiscriminatory unbundled access to OSS functions. I understand this requirement to mean that ILECs must provide parity to requesting CLECs across three dimensions: scope of information available; accuracy of information supplied; and timeliness of communication. (Ameritech MI Order, ¶ 139; S. Car. Order ¶ 98, FCC 97-418). In the rare instance where there is no retail analogue for OSS provided to a CLEC and parity cannot be measured, this Commission has stated that the BOC must show that it is providing CLECs "a meaningful opportunity to compete." (Ameritech MI Order, ¶ 141).

Interfaces and Specifications

9. In order to determine whether a BOC has satisfied the twin requirements that it has implemented OSS systems and interfaces capable of ensuring that it can "fully implement" the competitive checklist, and that it provides nondiscriminatory unbundled access to OSS functions and databases, two questions are key, as this Commission has recognized: First, are the interfaces, back end systems, business processes, and training the BOC employs non-discriminatory and adequate to fulfill competitive needs of CLECs? Second, assuming the BOC

proposes to use a competitively acceptable interface, systems, and processes to provide competitors access to a particular OSS function, has there been sufficient experience with the interface and associated systems and processes so as to ensure they will work "as advertised"? (Ameritech MI Order, ¶ 136; S. Car. Order ¶ 96).

10. In theory there are numerous ways a CLEC might be able to access BOC OSS functions. One basic distinction is between automated access and manual access.

11. Manual access means that the CLEC's access is mediated by human intervention on the part of the BOC. For example, when a CLEC orders a resale service or unbundled element manually, it ordinarily means that the CLEC transmits an order form to the BOC by facsimile, at which point a BOC employee types the information supplied on the form into the BOC's computerized order entry system. Manual intervention also occurs when, after information is exchanged electronically, a BOC representative must re-enter or otherwise manipulate it before it can be processed downstream.

12. Manual access arrangements are simply not compatible with MCI's needs as a new entrant. Every manual intervention causes delay, sometimes substantial, and creates significant risk of error. By relying upon manual interventions, the ILEC makes its competitors dependent on the hours, efficiency, and accuracy of its own employees -- including their incentive or lack of incentive to be efficient and accurate. Also, manual arrangements increase CLECs' costs in two ways: CLECs must employ more people to handle the process and to audit the ILEC's performance; and the ILEC will try to pass its own inflated costs through to the CLECs. As this Commission recognized in its order with respect to Ameritech's Michigan application, Ameritech's reliance on manual processing caused a "significant deterioration in performance as

orders increase." (Ameritech MI Order, ¶ 173). This Commission recognized similar issues with respect to BellSouth's reliance on manual processing in its prior applications. (S. Car. Order, ¶ 107; La. Order, ¶ 28, FCC 98-17). Accordingly, solutions that require manual intervention cannot be acceptable in either the short or long term. The question, then, is what automated arrangements are satisfactory.

13. Automated access means that information is exchanged between the CLEC and BOC computers. This can be done through a variety of different interfaces and protocols that range widely in degrees of sophistication and utility.

14. The most sophisticated type of automated access is termed electronic bonding and is articulated by several different specific protocols, the most common of which is the Open Systems Interconnect (OSI) Common Management Information Services Element (CMISE) Common Management Information Protocol (CMIP) network management protocol. Electronic bonding solutions are the most sophisticated and useful because, in certain applications, they can allow new entrants to approximate the same real-time access to the BOC's functions as the BOC itself enjoys. From the customer's perspective, interactions with a CLEC that has electronically bonded to the ILEC are indistinguishable from interactions with the ILEC. Furthermore, because electronic bonding links the CLEC's existing OSS system to that of the ILEC, the CLEC does not need to develop a new OSS to interface with the ILEC for a given function.

15. A less sophisticated automated arrangement involves the transfer of data between computer systems in batches. These "batch transfer" solutions work much like electronic mail. File transfer protocol, perhaps the classic batch interface, transmits large amounts of data at scheduled, periodic intervals. A second common batch transfer interface is Electronic Data

Interchange ("EDI"). Batch transfer solutions may be easier and less expensive to develop then electronic bonding.

16. Far less sophisticated "automated" access arrangements include dedicated access arrangements. In these arrangements, a CLEC has a computer terminal that gives it direct access to the ILEC's system. The ILEC's system is not connected to the CLEC's system, however. Thus, when the CLEC obtains information from the ILEC system, it must retype that information into its own system.

17. Each ILEC should adopt the automated interfaces and data formats adopted and approved by the relevant national standard-setting bodies or industry forums. The four principal groups are: the OBF of the Carrier Liaison Committee; the T1 Committee; the Electronic Communications Implementation Committee ("ECIC"), and the Telecommunications Industry Forum ("TCIF"). All four are sponsored by the Alliance for Telecommunications Industry Solutions ("ATIS") and accredited by ANSI. ILECs should adopt standardized systems for two reasons. First, for CLECs that hope to compete in markets presently controlled by different BOCs, it is absolutely critical that interfaces are uniform. The costs of developing systems and software and of training necessary to use any particular interface are substantial. This is why most BOCs try to unify their own systems. A nationwide CLEC like MCI must be able to realize similar economies. It can only do so, however, if the several large ILECs conform to nationally standardized interfaces and formats.

18. Second, the industry forums are well positioned to resolve which interfaces and formats are reasonably necessary and practical for each particular OSS function or sub-function. Different functions and services may create different OSS needs. For example, pre-ordering

functions which are conducted while the carrier's service representative is actually speaking with the end-user require real time accessibility; billing functions do not.

19. For both of these reasons, I agree that "[i]deally, each incumbent LEC would provide access to support systems through a nationally standardized gateway." Local Competition Order ¶ 527. Consistent with this view, MCI is investing its development funds for OSS in the technical interface solutions developed through the industry forums. The FCC chose to rely on the carriers to agree to nationally standardized interfaces voluntarily. I believe that the likelihood that the large ILECs and CLECs will reach voluntary consensus on nationally uniform interfaces will be sorely tested if the BOCs are allowed to offer in-region long distance services before such solutions are adopted. Because the time and additional capital investment required for CLECs to develop non-standard OSS interfaces are substantial, giving the BOCs incentives toward standardization is critical.

20. This Commission has stated that it does not yet consider national standards a prerequisite to non-discriminatory access, although "use of industry standards is the most appropriate solution to meet the needs of a competitive local exchange market." (Ameritech MI Order, ¶ 217). This Commission has also stated that it will consider taking additional action with respect to industry standards in the future. (Ameritech MI Order, ¶ 217). I continue to believe that this Commission should make adoption of industry standards a prerequisite of BOC entry into in-region long distance. At a minimum, where a BOC fails to adhere to an industry standard, the interface it adopts instead should provide equivalent functionality without requiring extensive and expensive duplicate development and training on the part of the CLECs.

21. While the industry forums have made substantial progress, they have not yet established standards for all OSS functions. Although this process can and should be completed promptly, one still has to ask what a BOC should be expected to do in the interim in order to satisfy section 271. Part of the answer is that the BOC should be expected to adopt the least costly interim solution that would give requesting carriers the same level of access to the BOC's OSS functions as the BOC itself enjoys. Where the basic shape of the industry solution is apparent, for example, the BOC should deploy an interface that fills in the contours of that shape, rather than deploying an entirely separate interface. That way both the BOC and the CLEC can concentrate their resources on implementing industry standards, while still achieving needed additional functionality through incremental expenditures prior to completion of those standards.

22. In short, a BOC's OSS interfaces should be deemed satisfactory only if these conditions are satisfied: (1) Wherever there exists an existing industry standard, the BOC must have adopted and implemented it; and (2) wherever an industry standard does not yet exist, the BOC must (a) enter into a binding contractual commitment (backed up by adequate contractual guarantees and enforcement mechanisms) to comply with industry standards as soon as possible (pursuant to a specified implementation schedule) and (b) offer and implement an interim solution that gives requesting carriers the same level of access that the BOC's operational groups have to its systems, and that is as consistent as possible with expected industry standards.

Operational Readiness

23. The adoption and implementation of an appropriate OSS interface, configured to appropriate specifications, is a necessary condition for the development of local competition, but it is far from sufficient. The interface merely governs the communication between the BOC and CLECs. The theoretical capacity for rapid and efficient communication between the carriers is of minimal benefit if either the BOC lacks the internal systems necessary satisfactorily to effect the functions a particular interface is designed to support, or the CLECs lack the systems, software, and training needed to make efficient and effective use of the OSS access provided.

24. In some cases the ILEC can employ the business systems it uses for its own retail customers in order to serve CLECs. But in some other cases the new CLEC-ILEC dynamic does impose new requirements on the ILEC's business systems. For example, before the 1996 Act, the ILECs did not have OSS systems in place to effectuate the unbundling of local switching. When a CLEC orders unbundled elements, the ILEC faces a new challenge not only in receiving and understanding that order (this is where the ordering interfaces come in), but also in carrying out that order. Thus, in addition to implementing an adequate interface, the ILEC must put in place business processes to use that interface as it is intended. This Commission has therefore appropriately recognized that the requirements of non-discriminatory access to OSS apply not only to the interface between the BOC and the CLEC but also to a BOC's downstream systems and business processes. (Ameritech MI Order, ¶¶ 134-135).

25. Assuming that an ILEC has deployed an appropriate interface and adequate downstream systems, it remains independently critical that the CLEC is able to use the ILEC's

interfaces effectively. (Ameritech MI Order ¶137). One may be tempted to assume that is the CLEC's own problem, and that the ILEC has no responsibility to train or support the new entrants. From the perspective of system development, that is a mistaken view. The ILECs in general, and certainly the BOCs, drive the process. They select the interface, tailor its specifications and vocabulary, and control the timing of its implementation. Moreover, as the staff of the Wisconsin Public Service Commission has explained, because a CLEC will have to rewrite its own OSS interfaces whenever an ILEC modifies its interfaces, "a company with significant market share [like the BOCs] can extend that market share" simply by revising its OSS specifications.[3] This is true even where a BOC nominally adopts an interface approved by an industry forum, because most industry-standard interfaces are loosely defined to allow individual carriers flexibility in tailoring their own specifications. Consequently, just as the market requires the manufacturer of a complicated software package to provide initial and ongoing customer support, regulators must ensure that the BOCs provide CLECs with adequate training and assistance -- including complete and intelligible manuals and pull-down on-screen menus where necessary.

26. In order for an OSS interface to work as planned, the interface itself, the business processes, and the training must all function appropriately. Ensuring that this occurs is a lengthy process and requires careful planning and testing. After each carrier's systems are developed and deployed, it is necessary to conduct "integration" testing -- full end-to-end trials designed to make sure that the systems can communicate properly with each other to accomplish the intended

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3/ Memorandum Re: Matters Relating to Satisfaction of Conditions for Offering InterLATA Service, Docket No. 6720-TI-120, at 11 (Wisc. PSC, Feb. 6, 1997).

results in the designed manner. After integration testing has been successfully completed, it is time to put the systems into actual competitive use, supporting "live" customer transactions. Even once this stage of actual implementation is reached, however, testing is not completed. To the contrary, it is almost inevitable that the early stages of actual competitive use will reveal design and operating flaws that had escaped detection up through integration testing, thus requiring further trouble-shooting and system modification.

27. Experience proves the critical point that a successfully tested OSS system is not the same thing as an operationally and commercially satisfactory system. This Commission's analysis of Ameritech's Michigan application shows why. Despite Ameritech's repeated pronouncements of the conclusion of successful testing, commercial usage of Ameritech's OSS revealed extensive problems including extensive due date modification, delayed Firm Order Confirmations and rejection notifications, and double billing. The problems with Ameritech are not unique. MCI has also experienced extensive problems with carriers' deployment of new interfaces in the access arena as well as with the deployment of new interfaces by other BOCs such as Pacific Bell for local.

28. As the foregoing discussion should make clear, from an OSS perspective, paper promises are not enough to ensure effective real-world application. Because deploying "operationally ready" OSS is a substantial and time-consuming undertaking, there is a real difference between saying a system is ready and actually using it to provide services in a commercially satisfactory way. In light of the innumerable potential glitches and pitfalls that must be eliminated prior to commercial availability, one cannot know how well things can be provided until they are supported by a full and varied track record of having been provided. In short, OSS

must be in real competitive use (not just business trials), subject to auditing and monitoring of key performance indicators and/or operation performance indicators, before OSS can be deemed to be operationally and competitively satisfactory. This Commission has therefore appropriately recognized that "the most probative evidence that OSS functions are operationally ready is actual commercial usage." (Ameritech MI Order ¶ 138; S. Car. Order ¶ 97). Indeed, I believe that commercial usage is the only reliable evidence of readiness. This Commission has indicated that there may be some circumstances where evidence other than commercial usage can prove readiness of an interface (Ameritech MI Order ¶ 138), but those circumstances certainly do not exist where CLECs are attempting to use that interface somewhere in the BOC's region. (Ameritech MI Order, ¶ 161). This Commission has recognized that OSS should be assessed on a regional basis where, as here, the BOC's OSS is regional. (Ameritech MI Order, ¶156).

II. BELL SOUTH'S OSS IS PATENTLY INADEQUATE

A. Summary

29. Given this background, for reasons I will explain in detail, I believe BellSouth's application remains patently inadequate from an OSS perspective. Although BellSouth has made improvements to its OSS in response to the decisions of this Commission and those of state commissions, BellSouth appears far from either offering non-discriminatory unbundled access to OSS functions or ensuring that other checklist items can be provided in timely, reliable, nondiscriminatory fashion, and in volumes adequate to meet demand. In my view, BellSouth's application falls short both because it relies on inappropriate interfaces and because it does not demonstrate that the interfaces and supporting systems are operationally ready.

30. First, although BellSouth offers a variety of automated interfaces, there are many important OSS functions for which BellSouth offers no automated interface. For example, BellSouth offers no automated interface for "service" jeopardies, "loss" notification for UNE customers (and many resale customers), ordering of UNEs when the customer wishes to switch some, but not all, of its service to a CLEC, or ordering of Local Number Portability. Even the ordering processes BellSouth claims to have automated, such as ordering POTS service, require too much manual intervention. BellSouth's own data reveal a lack of parity in the level of manual intervention required.

31. Second, BellSouth fails to offer an adequate machine-to-machine interface for pre-ordering. Instead, it offers a proprietary graphic user interface called LENS which requires dual data entry, forces CLECs to use BellSouth designed screens, and logs users out after a period of non-use. BellSouth's offer of "CGI" and "EC-Lite" does not eliminate this problem. CGI is, in reality, little, if any, different from the "HTML parsing" this Commission already found to be inadequate. EC-Lite is a proprietary AT&T interface with significant disadvantages in terms of expense and functionality.

32. Third, LENS (as well as CGI, and EC-Lite), in any case, provides less pre-ordering functionality than is available to BellSouth. LENS, unlike BellSouth's pre-ordering systems, does not include the entire Customer Service Record; LENS, unlike BellSouth's pre-ordering systems, does not include a due date calculator in the inquiry mode, and LENS, unlike BellSouth's pre-ordering systems, does not provide any method of assessing the availability of facilities for customers who desire complex services. A number of similar examples exist of functionality absent in LENS that is present in BellSouth's systems.

33. Fourth, BellSouth's systems are not operationally ready. BellSouth has presented no data, other than inadequate test data, to demonstrate the readiness of EDI -- the interface it relies on to show non-discriminatory provision of ordering information. Indeed, BellSouth presents no data of any sort to show that its EDI interface is operationally ready to receive UNE orders. MCI's own testing reveals problems with BellSouth's EDI interface for UNE orders that one would not expect to find in an interface that was operationally ready.

B. Pre-ordering

34. The pre-order function involves the exchange of information between carriers prior to, and in anticipation of, the placing of an actual order. Pre-order functions include, for example, address validations, telephone number reservation, and access to customer service records. BellSouth offers both LENS and EC-Lite as means for CLECs to access pre-ordering functions. Neither interface is adequate. Moreover, neither offers functionality equal to the functionality available to BellSouth itself.

1) BellSouth's Failure to Develop EDI TCP/IP

35. Both LENS and EC-Lite are proprietary systems. Proprietary systems create significant industry variations, creating challenges for training CLEC representatives to service customers across multiple service areas. MCI does not have a separate customer service center for each RBOC -- let alone each ILEC. Imagine training personnel on numerous different systems just to reserve a phone number for a new customer or to ascertain the next available date for